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To: Office of the Judicial Appointments and Conduct Ombudsman

Dear Sir,

I have recently filed a very serious complaint against Judge Simon Brown QC, in which I have accused him of corruption, with regard to the Birmingham High Court case **B40BM021.** The 3000 word limit in the web form was not really enough to do justice to the complaint. Also, after having written documents for the appeal, I am in a better position to articulate the number of transgressions he made during the hearing, and to bring emphasis to the most important issues. The court case was very serious, as I am suing a number of banks for market manipulation. The first defendant, Anshu Jain, is accused by BaFin of misleading the Bundesbank with fake Libor indices. Libor rigging was the scandal that has collapsed the profits of the global banking system and probably ranks as the worst fraud of all time. Thus Anshu Jain, if BaFin is correct, ranks amongst the worst fraudsters of all time. The judge appears to me to have rigged the case so that Jain could get away with a bare denial, immunity to cross-examination & immunity to notices to admit facts. I can only presume Judge Brown has been compromised by either Jain, or the company Jain keeps.

My appeal more or less alleges that the Judge totally corrupted what should have been a verdict in my favour, and then had a restraining order against me, so that it is hard for me to raise the issue in other claims. It is absurd and abusive to be labelled vexatious when the defendants have so recently been fined for the accusations I made against them – and I will not let the matter rest until justice is done. I attach the appeal documents, because they more or less describe the matter in detail. I believe that all the allegations I make can be directly verified in the claim documents and the court recording.

One issue I did not raise in the appeal, is that I made an accusation of accounting fraud against Deutsche Bank, inferred from its conduct in its defence, that it had destroyed its precious metal trading receipts, possibly to limit its liabilities for other frauds. With Deutsche Bank now publicly accused of laundering Russian Mafia money, and gold being a means of laundering money across borders, the accusation may have hit a nerve . The judge seemed to dismiss anything that could discredit the witness, and would not let me complete the argument. He also did not ask me to apologize for my accusations, which was odd. Either I owed the bank an apology, or the bank owed me an explanation.

Yours sincerely,
Mark Anthony Taylor

Attached below is a copy of the grounds for appeal, which was submitted on the 20th July 2015 to the Court of Appeal. I am having to file them against because I missed out a remission fee form.

Most of the points attack the judge's conduct and should serve as the basis of the complaint.

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Grounds For Appeal Strike Out of Claim for Case **B40BM021**

Background

BaFin, as referenced below, is the German regulator that monitors Deutsche Bank for market manipulation and other possible frauds. Anshu Jain, the first defendant is/was CEO for Deutsche Bank (he resigned during the course of the claim, although he still functions as a consultant for them).

1. I demanded Anshu Jain, and Emma Slatter, his witness, turn up for the oral strike-out hearing Jain applied for and be subject to cross-examination. The application was made by email to the defendant's solicitors while a copy of the email went to the court. Neither individual appeared in court. The strike-out hearing was allowed to continue on Anshu Jain's bare denial and absence. **We were not equal before the law as I could not cross-examine the applicant or his witness as I had demanded**.
2. **The judge acted as inquisitor from the start.** There was never any criticism from the judge of the defendants' evasiveness, dishonesty, recidivism or reticence. It was not adversarial in any sense.
3. The judge told the court that the bare denial defences the defendants had filed ('bare denial' being the literal wording of the first and second defendants) were not actually filed, with the defences deferred until the strike-out application was heard. This was an ambush that undermined my arguments in the replies to the defendants, and an ambush delivered by the judge. A bare denial, which amounts to stonewalling, is not equivalent to a deferred defence, which amounts to a demand for clarification (or some such). It was contrary to the the signed documents that were filed as defences by the defendants. The judge had both deliberately misrepresented the defendants' defences and then gifted them with a protection from the defendants exhaustive CPR 16.5 violations. **The judge provided an ambush defence for the defendants. The judge had also freed them from having to plead facts to serve as the basis for a proper strike-out application.**
4. All of the points of the defence consisted of legal precedent and procedure rules with no material pleadings. Since my pleadings contained facts, I was the only one who was vulnerable to contempt for dishonesty. The applicants, not providing a material pleading, had nothing to lie about. Again, **we were not equal before the law, as the applicants were not liable for dishonesty, and I was.**
5. After I served the claim, financial regulators from Germany, Dubia and the UK had established that the defendants had misled them during their investigations, found the defendants guilty and then fined them. To inform the court of these developments, and also to confirm that the allegations by the regulators were uncontested, I issued three notices to admit facts. In my PoC I alleged that the first and second defendant has misled BaFin with a fake audit and were guilty of market manipulation. The parallels were indisputable. The judge called the notices to admit facts vexatious, when in fact they were probative and created liability. **Transparent dishonesty by the judge.**
6. Emma Slatter's witness statement for Jain, was nothing more than a lecture on precedent and procedure and the philosophy of inference. There was nothing in that

witness statement to indicate what it was she actually witnessed. Jain had provided no witness statement of his own. The judge knew Slatter was in a position to establish whether the bank's gold manipulation audit was fake or genuine, and knew that Jain was in the same position too – as CEO, and the judge did not care that either of them would not admit or deny that the audit was fake, nor provide any evidence to show it was more than a press release. **The judge allowed the defendants to be evasive and obstructive when challenged on the key allegation, thus assisted the defendants to avoid liability for *conspiracy to commit fraud*.**

7. The judge ignored my demand that the defendants disclose a libor rigging report that would be highly detrimental to their own credibility. The defendants seemed to know in advance that the judge would not be disapproving of them for refusing to disclose a document in the evidence bundle that would discredit them. **Judge allowed defendants to avoid critical disclosures that discredited them.**
8. The judge refused to recognize any data that discredited the wtinesses, even when it came from regulators' findings, which was contrary to his assertion that it was not the court's duty to expose market manipulation. **Judge abused precedent and rules of procedure to ensure no evidence could ever be admissible and no argument valid – unless it came from the defendant.**
9. The judge in the summation denied key evidence of a fake audit was included in the evidence bundle. Why was this not said at the start of the hearing? Since the defendant had argued in a way that demonstrated the evidence had been considered, the allegations of an ommission were irrelevant, and the fact was that people who could easily validate the audit refused to provide evidence for it. **The judge was either disingenuous or disinterested in seeing the evidence that would establish the key allegation against the defendants was true.**
10. The latest claim I made uses more evidence than the previous two claims, since it addressed pertinent regulator reports that were released after the earlier litigation was written. It is also a claim against different materials. So neither the evidence, nor the materials match. It was not a vexatious repetition. **The judge was intent on proving vexatiousness, for the obvious purpose of filing a restraining order against me to stop me exposing the defendants' market manipulation**.
11. I made serious allegations against the lawyers for HSBC of perjury - that they had denied wrongdoing in a pre action phase, while admitting to wrongdoing to the FCA at the same time for a reduced fine (for FX manipulation), and these allegations were never mentioned, nor did the judge ask me to apologize for them. The pattern was repeated in HSBC's defence and explained in my reply to that defence. The judge claimed to have read all materials before the hearing. **Allegations of perjury ignored by judge.**
12. I accused the lawyers of being collusive, against their solicitor's code of conduct.The judge had no issue that competing businesses with a history of market manipulation assumed each other's innocence. If Deutsche Bank were manipulating the market in which Citigroup trades, then Citigroup, if they were honest, would want to see Deutsche Bank's audits in that market, especially when the very substance of that audit is challenged. **Fake naievity by judge.**
13. In the summary of the verdict, the judge, in liaison with the third defendant's counsel, called my demand to cross-examine defendants and witnesses vexatious and used it in part to justify a civic restraining order. I had never cross-examined anyone before. I never cross-examined anyone in the hearing. I have never cross-examined anyone after the hearing. I have never cross-examined. **The judge's argument was irrational. The judge used precedent and procedure rules to reason away my human right to cross examine the first defendant who had applied for the hearing so that the first defendant would not become liable under cross examination for frauds he had obviously committed.**

14. So I face a defendant who cannot be cross-examined orally or in writing, who pleads a bare denial, who fails to turn up for the oral hearing he applied for, who is accused by BaFin of providing false Libor reports to the Bundesbank, who does not answer the basic allegations of audit rigging, who knows the answers, who has resigned in disgrace, and whose advocate is called Judge Simon Brown QC. **A political favour to a defendant at the heart of the libor manipulation cartel.**
15. The judge near the end of the case asked me why I thought the case should not be struck out. This seemed to me a reversal of the burden of proof for a strike out application. So I answered 'because it is plausible' The judge just repeated his words. **Stonewalling and reversal of burden of proof.**
16. The judge's refusal to give his permission for an appeal and his restraining order are patently obstructive so that I cannot pursue a rightful claim against the defendants for market manipulation. There are over 1000 lawsuits against Deutsche Bank as a result of liabilities exposed following the regulator findings. **Discrimination against LiPs**? Or are they all vexatious?
17. The judge's ignorance of EU Competition law & the Enterprise Act of 2002 were apparent and he was in no position to judge a market manipulation lawsuit. It was left for me to address one of Citigroup's contentions, that I had identified an incorrect subsiduary. The judge was also unable to explain why there were no arrests for Cartel Offence, when the defendants had all been found guilty for cartel fraud. **The judge was ignorant of the laws appropriate to the claim, or just refused to apply them.**
18. I have sued the two CEOs of Deutsche Bank for market manipulation. Both have now resigned as a result of the liabilities for market manipulation that destroyed their bank's profits. The lawsuits were not fanciful, they were prescient. **The judge's claim that the lawsuits were meritless is counter to regulator findings and other similar lawsuits, in which defendants have settled.**
19. The judge denied *cause of action* while ignoring all evidence and being ignorant of competition laws. **He was either not fit to judge a cause of action or he was not honest enough to say if there was one.**
20. The judge was patronizing at the end, telling me the civic restraining order was for my own benefit. Which it clearly was not, because it prevents me from suing market manipulators for market manipulation which destroyed the value of materials I sold in the markets they manipulated. **Gaslighting.**

I, Mark Anthony Taylor, believe everything in this document to be true.

Date: